

Heading Home St. Louis County 2018 Ranking Strategy/Criteria and Appeal Process

Governance Board Approved on August 6/2018

SLC CoC ranks project applications based on how they improve the CoC System Performance, as required by HUD guidelines for the CoC Program Competition. Ranking based on performance is required in order for projects applications in the CoC to be eligible for Bonus Project funding.

To be eligible for ranking, all applicants and projects (new and renewal) must meet all HUD eligibility criteria, as outlined in the NOFA and comply with Local CoC Competition requirements as described in this document and project application forms. Projects that meet the eligibility criteria are scored by the Project Review and Rating Committee based on quality, performance capacity, and cost effectiveness.

The Project Ranking and Review Committee uses the CoC HUD Ranking Tool as the basis for ranking projects.

Ranking applies to all project applications, except CoC Planning, which HUD does not require CoC's to rank with other projects. All projects ranked fall into one of two Tiers as described in HUD's NOFA for the Fiscal Year 2018 Continuum of Care Program Competition, FR-6200-N-25 Request for Proposals.

Housing Projects

All housing projects are ranked on the HUD Ranking tool, based on their weighted Review Scores. Projects are ranked in descending order, with highest review scores at top and lowest at bottom. The highest ranked projects whose grant amounts total the Tier 1 ARD minus the HMIS renewal(s), SSO-Coordinated Entry renewal, and newly funded projects will be placed in Tier 1.

If there is a tie between two projects, a ½ point tiebreaker score will be used. The tiebreaker score will be based on cost effectiveness (cost per positive housing outcome), and will be calculated as follows, with the APR used for project reviews:

- For PSH: (# Stayers + # Leavers to Permanent Housing) / Total HUD CoC Program funds requested
- For RRH and Joint TH/RRH: # Leavers to Permanent Housing / Total HUD CoC Program funds requested

The project with the lower cost per positive housing outcome will be placed one rank higher than the other.

If there is a tie between more than two projects, the ½ point cost effectiveness tiebreaker will be applied as described above, followed by a tiebreaker based on the percentage of performance points awarded on the Ranking Tool. The project that received the highest percentage of performance points will be placed highest of the tied projects, followed by the next highest, and following.

One exception to ranking for housing projects applies: New housing projects awarded in the previous funding round and submitting for a first time renewal are not scored because the project has not started and has no additional data to provide. First time renewals from FY2017 were fully reviewed and ranked as new applicants in 2017. Those projects, if any, will be automatically ranked as the last housing projects fully in Tier 1

After housing projects are ranked, projects for HMIS and SSO-Coordinated Entry are placed in the ranking as follows, based on CoC policy objectives to ensure a functioning Coordinated Entry System and a Homeless Management Information System (HMIS). The projects are reviewed annually and affirmed as

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necessary and effective by the CoC Coordinated Entry Committee or by the HMIS Governing Board, as applicable.

HMIS projects totaling a minimum of 2% of Annual Renewal Demand (ARD) and Coordinated Entry projects totaling a minimum of 5% of ARD will be ranked in Tier 1 immediately below new housing projects from the previous funding round. Together, HMIS and SSO-Coordinated Entry projects will not exceed 15% of the value of ARD. Amounts in excess of those levels may be placed into Tier 2 or reallocated.

Tiers

Once the rank order of projects has been determined, the projects at the top of the list will be in Tier 1 and projects at the bottom of the list may fall into Tier 2.

- Tier 1 is equal to 94 percent of the CoC's Annual Renewal Demand, or \$2,785,753 for SLC CoC in 2018.
- Tier 2 is the difference between Tier 1 and the CoC's ARD plus any amount available for bonus projects (not including amounts available for DV Bonus projects and before adjustments are made to permanent housing leasing, operating, and rental assistance budget line items based on changes to Fair Market Rent (FMR)) as described in Section III.C.3.c of this NOFA. This does not include the amounts available for CoC planning and UFA Costs. Tier 2 equals the sum of \$177,814 (6% of ARD) + \$192,383 (bonus amount) = \$370,197.

The CoC Governance Board reserves the right to re-order the project list or request applicants increase/decrease their budget to best position the SLC CoC s CoC to receive the maximum overall amount of funding and improve the CoC's homeless response system performance and/or meet community needs. These adjustments are described in the next section.

Adjustments to Project Ranking

After reviewing the full ranking and breakdown by tier, the Committee members may recommend adjustments to the ranking or increase/decrease individual funding requests as described in the Tiering section. The Committee may also make recommendations about which project should be submitted as the permanent housing bonus. Rationale for any adjustment made will be included in the ranking tool, in notification to applicants, and in the Project Priority List posted for CoC membership review. In addition, any adjustment applied by the Committee will be applied uniformly across applicable projects.

Reordering may be proposed when:

- A project straddling Tier 1 and Tier 2 would not likely be feasible if only the Tier 1 portion were funded. Reordering in this case cannot reduce the rank for another housing project that would have been ranked fully in Tier 1 if reordering had not occurred.
- Analysis of likely project scores in HUD's review of projects within Tier 2 (as described in the NOFA section II.B.10.b) indicates that a revised order would result in higher overall scores for projects in Tier 2.
- Comment (with verification) received during the posting period for the proposed project priority list indicates the project was ranked incorrectly.

Heading Home St. Louis County 2018 Ranking Strategy/Criteria and Appeal Process

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Reductions may be proposed when:

- A project application falls fully or partially below the funding line (below Tier 2), exceeds the HUD-approved Allowed Renewal Amount for the project, or exceeds the total available DV Bonus, CoC Bonus, or reallocated funds.
- An HMIS or SSO-Coordinated Entry project exceed the limits for those project types in Tier 1.
- A project in Tier 1 meets any of the thresholds for involuntary reallocation AND a second project is straddling Tiers or falling partially below Tier 2. Renewal projects with a history of recaptured funds and/or low bed utilization will be prioritized for reductions. Reduction of this kind will only be applied during the ranking process if 1) the reduced project can reasonably be expected to continue to operate the project as proposed in the project application, and 2) the amount of the reduction does not exceed the amount of funds necessary to prevent a project from straddling Tiers or falling below Tier 2.
- A new project proposes a significantly higher cost per expected positive housing outcome than other similar projects.

After the specific reorder and reduction considerations listed above, Committee members may also consider the following in making adjustments in order or funding level for the final Project Priority List.:

- Geographic diversity. In order to provide access to CoC-funded housing and services across the CoC region, the CoC will review the project list in terms of potential impact on geographic regions and communities that have greater numbers of homeless households. Projects may be reordered or reduced to align greater potential funding with areas of high-need areas.

When adjustments are completed and all rationale is recorded on the project form and the list, the Committee will vote to approve the Project Priority List and present it to the CoC for comment. The proposed Project Priority List must be posted to the CoC website in accordance with HUD's timelines and requirements. Project applicants, COC members, and the general public will be given not less than 48 hours to provide comment. If comments provide verified information that affects project score, the Project Review and Rating Committee may choose to adjust that project's score or rank.

Based on feedback from CoC members (verified information either negative or positive affecting score), the Committee may choose to adjust an application's score or rank. Decisions of the Appeal Review Committee will also be incorporated into the final ranking. All adjustments based on input and appeals will be documented in the ranking form.

Upon approval by the CoC, the final project priority list, together with a final draft of the Collaborative Application will be posted for CoC review on or before September 11, 2018.

Selections and Award Notifications

All project applicants will be notified of their project status following the process below. In addition, as required by HUD guidance, the CoC membership will be notified regarding specific aspects of project applications submitted in the Local CoC Program Competition.

SLC CoC's Local Competition

All projects: The SLC CoC's Ranking Committee (a non-conflicted entity) will review new project applications on August 14/15, 2018, using the HUD Project Rating Tool. By August 17, 2018, the

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Committee (via the CoC Task/Staff Team leader) will provide all new project applicants final notice of project acceptance/rejection, any funding changes, score, rank, Tier 1/Tier 2 status, and source of funds expected for the project (i.e. reallocated funds, CoC Bonus, or DV Bonus). The notification will also include any required changes applicants must make in e-snaps to meet HUD requirements. All corrections in e-snaps must be made and the e-snaps project application re-submitted in pdf format by 4:00pm on Monday, August 27, 2018 to be included in the project list submitted for review in the national CoC Program Competition.

Appeal Process

Project applicant may submit appeals to the decisions of the Project Review and Rating Committee in certain circumstances where the applicant believes the project application was harmed by a violation of established CoC policy, CoC Program Competition guidelines, or HUD policies. Disagreement with the results of a decision that followed appropriate process will be deemed an invalid appeal.

Projects wishing to appeal related to scoring must submit the appeal in writing using the Appeals format below by email to bishopm@stlouiscountymn.gov by Tuesday, August 21, 2018 at 12:00pm.

All agencies filing an appeal must be prepared to rapidly respond to requests from the committee. An appeal meeting will be set up on Wednesday, August 22, 2018 at 10:00am for applicants to discuss the reason for their appeal. Applicants will receive notification of their appeal decision via email by Thursday, August 23, 2018 at 4:00pm.

Decisions of the Appeal Review Committee are final for the purposes of the Local CoC Program Competition.

Section 1: How to Appeal a Council Decision

Appeals Process

The application of any applicant agency which a) is unranked, or b) receives less funding than they applied for may appeal.

Applicants that have been found not to meet the threshold requirements are not eligible for an appeal.

Appeals cannot be based upon the judgment of the Review & Ranking Committee.

Applicants may appeal if they can:

Prove their score is not reflective of the application information provided; or

Describe bias or unfairness in the process, which warrants the appeal

All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed.

The Appeal Committee has flexibility as a governing board to allow for more options if it fits the deadlines of each particular funding stream.

The decision of the Appeal Committee will be final.

The Appeal Committee

The Appeal Committee will be made up of three (3) voting members of the Leadership Council.

Two members will not have participated on the original Rating & Ranking Committee.

One committee member must be a member of the original Review & Ranking Committee.

No member of the Appeal Committee may have a conflict of interest with any of the agencies applying for funding and must sign a conflict of interest statement.

The role of the Appeal Committee is to read and review only those areas of the application that are being appealed.

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Heading Home St. Louis County CoC Appeal Form

Agency: _____

Project: _____

Project Type (mark with an x)

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

CoC Bonus Project

DV Bonus Project

Reallocated Fund Project

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Expansion Project

Transition Project

Standard Renewal Project

Consolidated Renewal Project

For each item being appealed, please identify the category of appeal (using 1-4 above), and attach evidence to support your claim.

HUD CoC Program Competition (national competition)

Eligible project applicants that attempted to participate in the Local CoC Program Competition for FY2018 funds in the geographic area in which they operate, that believe they were denied the right to participate in a reasonable manner may appeal the CoC's decision not to include their project application in the CoC Priority Listing for FY 2018 funds. To appeal, the project applicant must have submit a Solo Application for funding to HUD, in e-snaps by the application submission deadline of September 18, 2018 by 8:00 PM Eastern time. For detail on the Solo Applicant appeal process, refer to Section X.C. of the NOFA.